

GABROY LAW OFFICES
Christian Gabroy (#8805)
Justin A. Shiroff (#12869)
The District at Green Valley Ranch
170 South Green Valley Parkway, Suite 280
Henderson, Nevada 89012
Tel (702) 259-7777
Fax (702) 259-7704
christian@gabroy.com
jshiroff@gabroy.com
Attorneys for Plaintiff Russell LeBarron

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

RUSSELL LEBARRON, an individual;

Plaintiff,

vs.

INTERSTATE GROUP, LLC; DOES I
through X; and ROE Corporations XI
through XX, inclusive,

Defendant.

Case No: 2:19-cv-01739-JCM-DJA

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
COUNTERCLAIM (ECF NO. 9)**

(FIRST REQUEST)

**STIPULATION AND ORDER TO EXTEND TIME
TO RESPOND TO COUNTERCLAIM (ECF NO. 9)**

IT IS HEREBY STIPULATED AND AGREED between counsel for
Plaintiff/Counter-Defendant Russell LeBarron ("Plaintiff") and Defendant/Counterclaimant
Interstate Group, LLC ("Defendant") as follows:

WHEREAS, on or about August 9, 2019, Plaintiff filed in the Eighth Judicial
District Court a Complaint (the "Complaint"), which was assigned Case No. A-19-
799959-C (the "Lawsuit");

WHEREAS, on or about September 10, 2019, Plaintiff served the
Defendant with the Complaint;

WHEREAS, Defendant filed a Notice of Removal with the United States
District Court, District of Nevada (ECF No. 1);

WHEREAS, Defendant filed its Answer and Counterclaim (the
"Counterclaim", ECF No. 9) on or about October 14, 2019;

1 **WHEREAS**, Plaintiff's responsive pleading is currently due by November 4,
2 2019;

3 **WHEREAS**, due to scheduling conflicts, the Parties agree to an additional
4 eleven (11) day extension through November 15, 2019, for Plaintiff to respond to the
5 Counterclaim; and,

6 **WHEREAS**, this is the first request for an extension regarding the filing of
7 Plaintiff's response to Defendant's Counterclaim, which is made in good faith, not for
8 purposes of delay, and neither party is prejudiced by this extension.

9
10 Dated this 28th day of October 2019.

11
12 Dated: October 28, 2019

Dated: October 28, 2019

13 Respectfully submitted,

Respectfully submitted,

14
15 By /s/ Christian Gabroy, Esq.
16 Christian Gabroy, Esq.
17 Justin A. Shiroff, Esq.
18 The District at Green Valley Ranch
19 170 South Green Valley Parkway,
20 Suite 280
21 Henderson, Nevada 89012
22 Fax (702) 259-7704

By /s/ Malani L. Kotchka, Esq.
Malani L. Kotchka
Hejmanowski & McCrea LLC
520 South Fourth Street, Suite 320
Las Vegas, NV 89101
Telephone: (702) 834-8777
Fax: (702) 834-5262

23 *Attorneys for Plaintiff*

Attorneys for Defendant

24
25 IT IS SO ORDERED.

26
27 

28 Daniel J. Albregts
United States Magistrate Judge

Dated: October 30, 2019